

Mr. Vince Ryan
Harris County Attorney
1019 Congress, 15th Floor
Houston, Texas 77002

Re: San Jacinto River Waste Pits Superfund Site

Dear Mr. Ryan:

As you are aware, the Environmental Protection Agency (EPA) and partner agencies, including Harris County, have provided oversight of the San Jacinto River Waste Pits Superfund Site (Site) work being performed by the Potentially Responsible Parties (PRPs). I would like to take this opportunity to provide an update on the recent oversight activities to ensure the protectiveness of the temporary armor cap over the northern waste pits at the Site.

As you may recall, on December 10, 2015, the EPA Dive Team completed an underwater inspection of the armor cap to provide an independent evaluation of how it has fared during the four years since construction. The divers inspected the cap visually, by mechanical probing, and by dual beam side-scan sonar. As a result of this oversight activity, the EPA identified a damaged area in the northwest portion of the cap.

The EPA then directed the PRPs to prepare a delineation, sampling, and repair plan for the damaged area. On December 23, 2015, following EPA approval of the delineation and sampling plan, the PRPs completed work to mark out the length and width of the damaged area and to collect sediment samples. The damaged area was irregularly shaped with dimensions of approximately 20-feet by 25-feet in shallow water that varied from 8-inches to 18-inches deep.

A total of seven surface sediment (0-6 inches) samples were collected within (3 samples) and outside (4 samples) of the damaged area. The samples within the damaged area were found to consist of rocks, aggregate, shell and sediment. The samples are being analyzed for the dioxin/furan congeners and the validated results are expected in about two months, or February 2016.

Field oversight of the work was performed by EPA staff and contractor to verify the work completed and confirm the accuracy of the sampling results. Several Harris County staff also viewed a portion of the work in progress. The EPA contractor collected split sediment samples from three of the sampling locations and sent the samples for analysis at an independent laboratory for comparison to the PRPs' sample results.

Following the EPA's approval of the repair plan, the PRPs completed work on December 31, 2015, to lay an 8-ounce geotextile fabric over the damaged area and cover it with a 1-foot minimum thickness of type C rock, which has a median diameter of 8-inches. Manual probing was done to confirm that the minimum rock cover thickness was achieved, and additional rock was added where needed. As was done for the delineation and sampling, field oversight of the repair work was provided by EPA staff and contractor.

The EPA appreciates the assistance provided by Harris County in cleaning up the San Jacinto Site, and looks forward to continuing this relationship. Enclosed please find the EPA's discussion of the issues

raised in your letter regarding the Site Remedial Investigation/Feasibility Study dated September 17, 2015, and raised in the dialog between EPA and Harris County during the meeting on December 8, 2015.

Sincerely,

Carl E. Edlund, P.E.
Director
Superfund Division